

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN JOSE DIVISION
4

5 IN RE: HIGH-TECH EMPLOYEE)
6 ANTITRUST LITIGATION)
7) No. 11-CV-2509-LHK
8 THIS DOCUMENT RELATES TO:)
9 ALL ACTIONS.)

10 _____

11
12 VIDEO DEPOSITION OF LASZLO BOCK
13 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
14 March 27, 2013

15
16 Reported by: Anne Torreano, CSR No. 10520
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10:54:13 1 who contacted you?

10:54:14 2 A. I do.

10:54:14 3 Q. What is it?

10:54:15 4 A. Egon Zender.

10:54:16 5 Q. And who did you interview with at Google?

10:54:22 6 A. I don't remember everyone I interviewed with,

10:54:26 7 but the list included Alan Eustace, Omid Kordestani,

10:54:33 8 Shona Brown, Jonathan Rosenberg, George Reyes. Oh, and

10:54:46 9 members of what would eventually be my staff. So Stacy

10:54:49 10 Sullivan, Judy Gilbert, Arnon Geshuri, Liane Hornsey,

10:54:55 11 which was a phone interview, Sue Wuthrich.

10:55:00 12 There were others. I don't recall who they

10:55:01 13 were.

10:55:01 14 Q. Okay. I'd like to ask you some questions

10:55:26 15 about Google's compensation system.

10:55:29 16 A. Okay.

10:55:33 17 THE WITNESS: Could I grab a little water?

10:55:35 18 MS. SHAVER: Sure.

10:55:35 19 Why don't we go off the record for a few

10:55:37 20 minutes?

10:55:37 21 THE WITNESS: Is that -- I just -- okay.

10:55:40 22 Thanks.

10:55:40 23 THE VIDEOGRAPHER: We're off the record at

10:55:41 24 10:54.

10:56:43 25 (RECESS TAKEN.)

11:04:25 1 THE VIDEOGRAPHER: We're back on the record at
11:04:52 2 11:03.
11:04:54 3 BY MS. SHAVER:

Redacted

11:05:09 8 Q. And do you recall approximately when that
11:05:11 9 happened?
11:05:11 10 A. I don't. It was sort of mid to lateish 2000s,
11:05:15 11 but I don't recall specifically when.
11:05:16 12 Q. Okay. And do you remember -- were you
11:05:18 13 involved in that decision?
11:05:20 14 A. Yes.

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11:08:00 3 MS. SHAVER: I'd like to mark this as an
11:08:03 4 exhibit.

11:08:03 5 (DEPOSITION EXHIBIT 2418 MARKED.)

11:08:03 6 BY MS. SHAVER:

11:08:03 7 Q. This document is Bates-stamped
11:08:08 8 GOOG-HIGH-TECH-329873.

11:08:11 9 Mr. Bock, throughout the day I'm going to be
11:08:13 10 putting documents in front of you which are what we
11:08:16 11 call exhibits.

11:08:16 12 A. Okay.

11:08:17 13 Q. You are always welcome to read as much of the
11:08:20 14 exhibit as you like. Frequently I will be asking you a
11:08:23 15 question about a specific part of it, and if so, I'll
11:08:25 16 point you to it. But you can always say, "Hey, I'd
11:08:28 17 like more time to get the full context."

11:08:31 18 Okay?

11:08:31 19 A. Okay. Thank you.

11:08:33 20 Q. So in this document I'm just interested in the
11:08:35 21 very first sentence where you -- well, first of all, do
11:08:37 22 you recognize this document?

11:08:38 23 A. I don't remember this one specifically, but it
11:08:41 24 says it's from me, so I believe it's from me.

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11:11:33 14 A. No, that's not correct.

11:11:34 15 MR. RUBIN: Objection.

11:11:35 16 Give me one second.

11:11:37 17 THE WITNESS: Oh, sorry.

11:11:37 18 MR. RUBIN: Objection. Form.

11:11:39 19 THE WITNESS: No.

11:11:40 20 MR. RUBIN: Now you can answer.

11:11:41 21 THE WITNESS: That is not correct.

11:11:43 22 BY MS. SHAVER:

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11:49:03 1 proved to be a very good idea for Google.

11:49:07 2 So yeah.

11:49:25 3 BY MS. SHAVER:

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11:49:55 6 MS. SHAVER: Can I have 39?

11:50:10 7 Please mark this as the next exhibit.

11:50:11 8 (DEPOSITION EXHIBIT 2422 MARKED.)

11:50:20 9 BY MS. SHAVER:

11:50:20 10 Q. This document is Bates-stamped

11:50:25 11 GOOG-HIGH-TECH-328300.

11:50:29 12 Mr. Bock, do you recognize this document?

11:50:36 13 A. I don't remember it, but, you know, it's an

11:50:44 14 e-mail that I'm on.

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12:05:34	17	MS. SHAVER: Let's take a break.
12:05:35	18	THE VIDEOGRAPHER: We're going off record at
12:05:40	19	12:04.
12:05:43	20	(RECESS TAKEN.)
12:25:57	21	THE VIDEOGRAPHER: We're back on the record at
12:26:24	22	12:25. This is the beginning of video No. 2.
12:26:35	23	MS. SHAVER: I'd like to mark the next
12:26:38	24	exhibit, please.
12:26:39	25	(DEPOSITION EXHIBIT 2423 MARKED.)

12:26:48 1 BY MS. SHAVER:

12:26:48 2 Q. This exhibit is Bates-stamped

12:26:51 3 GOOG-HIGH-TECH-210276.

12:26:56 4 Mr. Bock, do you recognize this document?

12:26:57 5 A. It's an e-mail that I'm on.

12:27:01 6 Q. Okay. If you'll look in the middle of the

12:27:05 7 page, it's an e-mail sent from you to Kent Walker,

12:27:10 8 David Drummond, Laszlo Bock, Shona Brown, Becky Bucich

12:27:13 9 on June 26th, 2008.

12:27:16 10 Do you see that?

12:27:16 11 A. Mm-hmm.

Redacted

Redacted

12:34:54 1 levels that we were talking about earlier. We now have
12:34:56 2 the documents so ...

12:34:58 3 A. Okay. Good.

12:34:59 4 MS. SHAVER: I'd like to introduce the next
12:35:01 5 exhibit, please.

12:35:02 6 (DEPOSITION EXHIBIT 2425 MARKED.)

12:35:11 7 MR. RUBIN: Just to be clear, you weren't
12:35:12 8 suggesting I -- I didn't interpret it that way, but
12:35:14 9 just so it's clear in the transcript, you weren't
12:35:16 10 suggesting I didn't produce them before. You just have
12:35:18 11 it today?

12:35:19 12 MS. SHAVER: That's correct, yeah.

12:35:20 13 THE WITNESS: You're not going to make me read
12:35:22 14 this whole thing; right?

12:35:24 15 MS. SHAVER: I'm not.

12:35:25 16 THE WITNESS: Okay.

12:35:26 17 BY MS. SHAVER:

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1 REPORTER'S CERTIFICATE

2 I, Anne Torreano, Certified Shorthand
3 Reporter licensed in the State of California, License
4 No. 10520, hereby certify that the deponent was by me
5 first duly sworn, and the foregoing testimony was
6 reported by me and was thereafter transcribed with
7 computer-aided transcription; that the foregoing is a
8 full, complete, and true record of said proceedings.

9 I further certify that I am not of counsel or
10 attorney for either or any of the parties in the
11 foregoing proceeding and caption named or in any way
12 interested in the outcome of the cause in said
13 caption.

14 The dismantling, unsealing, or unbinding of
15 the original transcript will render the reporter's
16 certificates null and void.

17 In witness whereof, I have subscribed my name
18 this 9th day of April, 2013.

19
20 ☐ Reading and Signing was requested.

21 ☐ Reading and Signing was waived.

22 ☒ Reading and Signing was not requested.
23
24

25 _____
ANNE M. TORREANO, CSR No. 10520

**CORRECTIONS TO DEPOSITION TRANSCRIPT OF
LASZLO BOCK, DATED MARCH 27, 2013**
In re High-Tech Employee Antitrust Litigation
Case No. 11-CV-2509-LHK (N.D. Cal.)

Page:Line	Amendment	Reason for Amendment
22:20	Replace: "Degan" With: "Deegan"	correction to transcript error
27:11-12	Replace: "Stacy and" With: "Stacy who"	correction and clarification
29:7	Replace: "Degan" With: "Deegan"	correction to transcript error
34:25	Replace: "executive office" With: "executive offers"	correction and clarification
36:5	Replace: "recollection on" With: "recollecting"	correction to transcript error
50:10	Replaced: "comp-out comps" With: "comp outcomes"	correction to transcript error
65:5	Replace: "contemporaneous" With: "contemporaneously"	correction to transcript error
71:2	Delete "So yeah"	correction and clarification
75:1	Replace: "Alan" With: "Allan"	correction to transcript error
75:10	Replace: "manager" With: "major"	correction to transcript error
75:16	Replace: "are" With: "have"	correction and clarification
88:23	Replace: "what guidelines"	correction and clarification

Page:Line	Amendment	Reason for Amendment
	With: "the guidelines"	
111:8	Replace: "on the press" With: "in the press"	correction to transcript error
111:9-10	Replace: "what else would they look at." With: "what else would they look at?"	correction to transcript error
141:10	Replace: "has not" With: "doesn't have"	correction and clarification
148:5	Replace: "get" With: "got"	correction to transcript error
156:20	Insert "more" after "Certainly"	correction and clarification

Subject to the above changes, I certify that the transcript is true and correct.



Signature



Date